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ABSTRACT

A response is made to a special report "An Assessment of the Michigan Accountability Program" prepared by a committee composed of Drs. Ernest House, Wendell Rivers, and Daniel Stufflebeam under contract with the Michigan Education Association (MEA) and the National Education Association (NEA). The three-men panel was to evaluate the educational soundness and utility for Michigan of the Michigan Accountability Model with a particular focus on the assessment component. Data for this investigation were gathered by reviewing publications of the Michigan Department of Education (MDE) and interviewing various educators, citizens, MDE staff members, and representatives of various organizations. To some extent, the study produced observations and judgments without inaccuracies or emotional exhortations. However, the report contained some inaccuracies, it was not totally unbiased, and it appeared to be based on somewhat unrigorous and hurriedly-gathered information. Problem areas included observations on goals and objectives, state level leadership, testing, teacher evaluation, and the compensatory education program. (Author/DEP)

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A Staff Response

to the report:

AN ASSESSMENT OF THE MICHIGAN ACCOUNTABILITY SYSTEM

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

Michigan Department of Education

May, 1974

FOREWORD

The staff of the Michigan Department of Education is pleased to be able to respond to the NEA-MEA contracted study on the Michigan accountability system.

We have attempted, in responding to the report and the nine recommendations, to provide as objective a response as is possible. It is interesting to note, of the nine recommendations made by the Panel, six of them have the full support of the staff, and appropriate modifications will be made consistent with those six recommendations.

The staff does not agree with three of the recommendations and hopes that future discussions will resolve these three differences of opinion.

Finally, as Superintendent of Public Instruction, I am pleased that the National Education Association joined with the Michigan Education Association in financing this study. In effect, the study has done much to help us focus attention and understanding on what has become one of the crucial issues in public education in these United States -- the issue of educational accountability.

John W. Porter

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A RESPONSE TO THE REPORT AN ASSESSMENT OF

THE MICHIGAN ACCOUNTABILITY SYSTEM

Introduction

On April 12, 1974, representatives of the Michigan Education Association (MEA) and the National Education Association (NEA) held a press conference in Lansing, Michigan. The purpose of this conference was to announce the release of a special report entitled An Assessment of the Michigan Accountability System which was prepared by a committee composed of Drs. Ernest House, Wendell Rivers, and Daniel Stufflebeam under contract with the MEA and NEA.

As originally conceived by the MEA and NEA, the three-man panel was to "evaluate the educational soundness and utility for Michigan of the Michigan Accountability Model with a particular focus on the assessment component."[1] The report was to be the sole responsibility of the panel, and there was no commitment on the part of the MEA or NEA to endorse the findings of the panel.

Data were gathered for this investigation by reviewing publications of the Michigan Department of Education (MDE) and interviewing various educators, citizens, MDE staff members, and representatives of various organizations. These efforts were spread over a period of time from approximately December 15, 1973, to March 1, 1974, or two and one-half months.[2]

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[1]Ernest House, Wendell Rivers, and Daniel Stufflebeam, An Assessment of The Michigan Accountability System (a report available from the Michigan Education Association, East Lansing, Michigan: March, 1974), see APPENDIX.

[2]"Assessment of Michigan's Accountability System," Teacher's Voice (East Lansing, Michigan: Michigan Education Association, April 22, 1974, supplement), p. 12.

Thus, it would, on the surface, appear that the MEA and NEA desired to conduct an unbiased and objective evaluation of Michigan's educational accountability program--a study which would produce observations and judgments without inaccuracies or emotional exhortations. To some degree, the panel succeeded in meeting this expectation; however, (1) the report does contain inaccuracies, (2) it does not seem to be totally unbiased, and (3) it appears to be based on somewhat unrigorous and hurriedly-gathered information.

The Department recognizes the complexity of the task which faced the three-man panel. The amount of information available on the topic of educational accountability in Michigan is enormous and reaching objective conclusions about the topic is difficult at best. The panel undoubtedly did its best under these circumstances and should be recognized for its efforts.

Nevertheless, the position of the Michigan Department of Education is that through criticism comes growth and the Department itself must be accountable if it is to encourage others to be accountable. The Department's approach, therefore, is to seriously consider each charge and each recommendation of the panel to determine: 1) if the panel's conclusions are based on inaccurate or insufficient information, 2) if the panel's conclusions simply reflect a difference in philosophy of education, or 3) if the panel's conclusions have value for improving the programs of the Department.

This report will be organized parallel to the panel's document. Each major section of their document will be analyzed and comments offered to clarify the issues involved. More detailed responses to each of the panel's recommendations is attached as an APPENDIX to this paper.

State Level Leadership

It is gratifying to note that the panel found the staff of the Michigan Department of Education to be courageous, have good motives, and be highly skilled.[3] Department leaders have always attempted to maintain a high level of staff quality and feel that they have been very successful in assembling a staff which has enthusiasm and a willingness to venture into the unknown.

The panel evidently feels that accountability has been thrust on Michigan education with too much speed and without an adequate rationale.[4] The staff recognizes that accountability is a complex issue and that there is little outside information available beyond the Michigan experience to guide the development of accountability efforts. However, while the panel evidently fears this situation and would wait until someone else invents the guidelines, the MDE approach has been to challenge the unknown and develop knowledge where none existed.

As an interesting side note, the panel claims "researchers have not produced tested standards and procedures for state accountability systems."[5] This being the case, how can the panel be so presumptuous as to establish itself as the best judge of the quality of the Department efforts? For that matter, what standards were used by the panel to judge the current accountability program in Michigan? Were the standards reasonable? Were they acceptable to a group such as the American Educational Research Association?

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[3] House, et al, An Assessment of the Michigan Accountability System, p.2.

[4] Ibid., p.3. [5] Ibid.

The Six-step Accountability Model

It is gratifying to see that the panel report is favorable toward the Michigan State Board of Education's six-step accountability model.[6] Evidently, the panel sees the model for what it is--simply a series of steps, a particular process to be exact, designed to lead to better and more careful educational planning.

The Department recognizes that difficulties arise when these simple six steps are implemented at the local level, and, furthermore, the more specific in nature the step is, the more complex becomes the decisions which have to be made. The Department makes every effort to reduce those factors which will be "counter productive" and "inconsistent with the model," to use the panel's words, but as with any innovation as complex as this one, apparent problems do arise, and the Department does not wish to claim that such problems have not occurred. The Department intends to continue doing all it can do to identify and correct these problems as they arise.

Step 1: The Common Goals. The panel reports that the Common Goals of Michigan Education are "broad and generally non-controversial" but that the goals are unclear and not subject to an ongoing review.[7]

The Department agrees that the goals are broad and may, to some, appear to be unclear. However, goals are not designed to be highly specific and detailed. By their very nature they are supposed to indicate general direction only. They are intended to be long range and subject to change only after sufficient evidence warrants such changes.

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[6] Ibid., pp. 3-4.

[7] Ibid., pp. 4-5.

The panel suggests the goals be periodically reviewed and updated but gives no indication of its recommended time-line for such review. The Department agrees that such reviews are necessary in the long term, and such a review of the twenty-two goals of Michigan education will be established. Indeed, the Superintendent of Public In truction will request the Council on Elementary and Secondary Education to annually review the educational goals in light of new information.

Step 2: The Objectives. The panel report indicates that the Department has not articulated performance objectives in all goal areas but has primarily done work in the cognitive areas.[8] This is basically true but is misleading. The Department has done some preliminary work in developing performance "indicators" in all of the twenty-two goal areas through the ESEA, Title III needs assessment report. The Department has also attempted the development of affective domain objectives for grades K-9 and has a commission working on it now; however, as might be expected the development of such objectives is difficult and subject to considerable debate. Objectives in the psychomotor and affective domain areas have been developed for the preprimary levels and will be incorporated in the first grade assessment during 1974-75. Psychomotor objectives for grades K-9 have also been developed.

The panel report implies that the Department has developed only 23 and 35 fourth grade reading and mathematics objectives, respectively, and 23 and 45 seventh grade reading and mathematics objectives, respectively.[9] This is not true. The numbers cited reflect the objectives included in the

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[8] Ibid., p. 5.

[9] Ibid., p. 5.

1973-74 Michigan Educational Assessment Program tests. The Department widely advertised in its publications and numerous workshops that the assessment program would only measure a subset of the performance objectives.

The panel claims that the objectives are not based on a consensus of Michigan teachers but are instead based in part on practical considerations such as test length.[10] Practical considerations, of course, did play a part in determining the objectives to be assessed in 1973-74 but such considerations did not restrict the development of the total set of objectives. Even so, the objectives which were measured were selected on the basis of highest priority within the given limits of available test time. Only two or three of these items were subsequently removed when the pilot test revealed some questions about their reliability.

More importantly, the panel states that "the objectives so far developed do not represent a consensus of educators."[11] Whether or not this is true depends upon how one interprets the word "consensus." The Department admits that it did not poll each of the state's 100,000 professional teachers regarding the performance objectives and, to that extent, did not produce a consensus. However, the performance objectives were not developed in the dark under a bushel basket but were, instead, developed with the assistance of hundreds of teachers, curriculum specialists, and administrators. Each Department instructional specialist was responsible for subjecting the objectives to open scrutiny by other educators, and each can document the people to whom sets of draft objectives were sent for review. Additionally, the objectives were evaluated in eleven elementary schools and seven secondary schools as to their reasonableness.

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[10] Ibid., p. 6. [11] Ibid.

Furthermore, each set of objectives was reviewed and approved by a panel of educators, citizens, and students, and by the Council on Elementary and Secondary Education before being recommended to the State Board of Education. Even so, the Department recognizes that the performance objectives should not be considered perfected at this point but subject to further review and revision. In fact, the Department is actively encouraging local educators to analyze the objectives and share their comments with the Department's instructional specialists. Additionally, contracts have been issued to the Michigan Council of Teachers of Mathematics and to the Michigan Reading Association to review the results of the 1973-74 educational assessment and the original performance objectives and recommend changes which might be used to improve the quality of the objectives and the assessment program.

The panel also criticizes the Department for its use of the term "minimal performance objectives" and claims that the objectives as developed do not represent a "minimal" quality. The panel cites California Test Bureau and implies that failure of CTB"s "sensitivity to instruction index" in some ways confirms the lack of validity of the objectives.[12]

The Department agrees that there is confusion over the term "minimal." On the one hand, a minimal objective might be thought of as reflecting only what students can do now as opposed to what is desirable for students to be able to do without regard to whether or not they can do it now. The former definition assumes the status quo to be the criterion of success for an objective whereas the latter definition encourages one to establish a criterion independently and a priori.

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[12] Ibid., pp. 6-7. (See p. 13 for further discussion of this issue.)

Unfortunately, many citizens and educators hold the expectation that the Department fully expected and, in fact, knew that the minimal objectives would be attained by almost all students during the 1973-74 assessment. This was, however, not the case. The Department expected the objectives not to be attained by most of the students last fall but to be worthy of attainment as soon as possible (assuming the objectives were not changed in the review process) as a result of improved instruction.

The whole issue reduces itself to one of whether or not there exists a common core of objectives that transcend local district boundaries and for which all schools should be responsible for helping students attain. The Department's position is that these objectives do in fact exist, that they are identifiable through a rational process, and that the effort is worthwhile. The Department believes that if no common core of objectives exists, the movement of families from one location to another is seriously jeopardized. In fact, the process of changing classrooms in a given school or building would be subject to challenge! Evidently, the panel simply does not share the Department's attitude.

As a related issue, the panel questions making available a list of these objectives to parents in the form of a "parent handbook."[13] If one assumes that these objectives can be identified and have been made available to each local school district, there is no reason why they should not be communicated to parents and citizens. However, the Department recognizes that such a booklet of objectives for parents would be controversial, so steps are being taken to determine the reaction of parents, citizens, and educators in selected districts to the desirability of this process. This

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[13] Ibid., p. 8.

process, it should be mentioned, is intended to involve parents and citizens in the educational process which is clearly specified in the Common Goals of Michigan Education.

Step 3: The Assessment Component. Because the panel devoted extensive space to a critique of the Michigan Educational Assessment Program, the issues will be addressed in a later section of this document.

Step 4: Analysis of Delivery System. The panel evidently feels that the Department is to be commended in its efforts to identify workable, alternative delivery systems but objects vigorously to one specific state effort, the so-called Chapter 3 Program.[14] Since an entire section was devoted to this one Program, it will be discussed in a later section of this document.

Step 5: Developing Local Evaluation Capabilities. The panel made the observation that local school district personnel need assistance in developing evaluation capabilities.[15] The Department agrees that there is such a need and is committed to determining the best approaches to assist in this endeavor.

During the past four years, the Department's evaluation activities have expanded considerably. Currently, seven programs of the Department are being evaluated. These evaluation activities cover nearly 1,100 projects in over 500 school districts. Additionally, technical assistance in evaluation is available to state and local educators in the form of consultation and workshops. Annually, 30 or more workshops are conducted throughout the state for local education agency staff.

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[14] Ibid., pp. 9-10. [15] Ibid., p. 10.

The staff is currently conducting a survey of local and intermediate school district resources and capabilities in evaluation. Based on the results of this survey, which will be made public later this year, more adequate services will be planned and designed to provide expansion of activities associated with step five of the accountability model. This expansion will proceed consistent with the interest, capabilities, and needs of local and intermediate school districts.

Step 6: Use of Accountability Data for Decision-Making. The panel states its suspicion that few decisions or recommendations are being made on the basis of the results of the educational accountability program.[16] This is, of course, sheer conjecture on their part because they did not attempt a study to reveal the extent to which decisions are being affected either by the assessment component or the overall accountability program.

Department staff know of many instances where the Department's accountability efforts over the last five years have affected educational decisions at the legislative, judicial, state agency, and local school district levels. The primary effect has been on the state agency and local school districts because they make educational decisions on a daily basis.

However, the Department recognizes the need for additional data on this point and will begin conducting studies which would document the impact of the state assessment program on local agency decision-making.

The remainder of this report focuses on two of the unique programs underway in Michigan which were criticized by the MEA/NEA panel.

State Assessment

The panel devoted considerable attention to the Michigan Educational

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[16] Ibid., p. 11.

Assessment Program. This, perhaps, reflects the fact that this Program has been somewhat controversial--for various reasons--since it began in January, 1970. This section of their report had the greatest potential of improving the accountability effort in Michigan, but it, unfortunately, fell short of its potential. The discussion presented by the authors is confused on certain errors of fact and muddled by emotional arguments which will be clarified in the following pages.

The authors cite three reasons for the Department's move from the normative tests used from 1970-73 to the new objective-referenced tests.

1) unfair comparisons between school districts,

2) tests discriminated against minority youth, and

3) the tests did not measure what Michigan teachers were teaching in the schools.[17]

The panel further states that the objective-referenced tests have been well received because the Program corrected these three faults.

As a matter of fact, school district comparisons (fair or unfair) can still be made through the use of objective-referenced tests. The purpose of a needs assessment program is to identify areas of greatest educational need and, thus, by definition implies a comparison. What is not implied, however, is a comparison of efficiency of school programs. Comparisons under the normative or the objective-referenced tests are, therefore, not inherently unfair, inadequate, or incorrect. Such comparisons become unfair only when people assume that the needs assessment program is a report card ranking or evaluation of the state's schools.

It is probably true that the normative assessment tests discriminated between nonachievers (who, coincidentally, are most likely to be from lower

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[17] Ibid., p. 12.

socioeconomic classes) and achievers but so do the objective-referenced tests. Indeed, the very purpose of any achievement test is to reveal (to discriminate) differences in educational attainment between students.

The issue, here, is whether or not minority children should be expected to always achieve less and, therefore, be tested with a separate test. The Department makes the assumption that there is no reason why most children cannot achieve certain minimal skills and, therefore, it is appropriate to determine if such skills are being achieved, and, if not, the reasons why. To design a minority group test would certainly be possible, but the question is, "Should it be done?" The staff say no!

As a related issue, it should be made clear that the 1973-74 fourth and seventh grade assessment tests were piloted in the large cities of Jackson and Pontiac and in all eight regions of Detroit. Minority group students, if anything, were over-represented in developmental phases of the project contrary to what the panel report indicates.[18]

The third point raised by the panel is probably the most frequently cited reason why objective-referenced tests were developed. However, it, too, is close to being a moot issue because there is no reason why normative tests cannot reflect Michigan's curriculum. There is evidence to suggest that the curriculum of schools nationwide is very similar and that any achievement test used in the schools could be used widely. Indeed, this has been a major criticism urban school districts have had of textbook publishers.

The real reasons why the Department moved toward objective-referenced tests are that 1) the accountability model specifically calls for

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[18] Ibid., p. 14.

such objective-referenced assessment, 2) the development of performance objectives and tests tied directly to them is a useful process for educators because it clarifies instructional intentions, and 3) the objective-referenced test data are much more specific and, hence, useful to teachers in better responding to individual student needs.

The Tests. The panel compliments the Department on the reliability of its new objective-referenced tests but questions the validity, again, and cites the failure of CTB's "sensitivity index" as reason for questionning the validity.[19]

The Department viewed CTB's sensitivity to instruction index as experimental. The index is not widely used or endorsed by other reputable test publishers. CTB had not experienced dramatic and repeated success with the index, but the Department felt the method was worth trying in the developmental phases of the project in addition to other, more conventional methods.

In practice, the index did not work well for a variety of reasons, some of which were specific to the Michigan project. Failure of this index does not necessarily indicate any inadequacy of the index for other situations, nor is it evidence of weakness in the test! The sensitivity to instruction data were not adverse but inconclusive, and, for that reason, not used.

The report entitled "Development of Test Items and Instruments in Reading and Mathematics for the 1973-74 Michigan Educational Assessment Program" discusses eight different types of information considered in

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[19] Ibid., p. 13.

selecting items and objectives for the assessment tests.[20] While the report was provided to the panel, this information unfortunately seems to have escaped their consideration.

Involvement of Teachers in Developing Tests and Objectives. The panel discussion of this point is totally without merit. First, it should be made clear that thirteen panels (not one) were involved in the review of the draft performance objectives after preparation by various referent groups. There were thirteen such panels each with teachers as members. There were nine referent groups each composed of thirty people. Teachers, levels K-university, dominated the referent groups. Additionally, hundreds, if not thousands, of educators reacted to the draft objectives before the State Board of Education approved them.

Secondly, the reference to a lack of significant involvement on the part of the reading panel is out-of-place in that it refers to a panel used to improve items for an older normative test and not the newer objective-referenced tests. Moreover, the reference to this particular reading panel cites two local educators who, in the past, have led opposition to the assessment program and, thus, are not exactly unbiased observers.[21]

As a third point, it should be mentioned that the Michigan Education Association was invited to nominate a representative to serve on the Michigan Educational Assessment Program advisory council when it was being formed in the summer of 1972. However, the MEA did not respond until after the council members were selected.

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[20] Michigan Department of Education, Development of Test Items and Instruments in Reading and Mathematics for the 1973-74 Michigan Educational Assessment Program (Lansing, Michigan: Michigan Department of Education, 1974), pp. 19-26.

[21] House, et al, An Assessment of the Michigan Accountability System, pp. 13-14.

Cost of Every Pupil Testing. The panel report leads the reader to believe that the assessment program is going to be expanded to other grade levels and other subject areas which is true. However, the panel then launches into a discussion of the gigantic cost associated with such an expansion.[22]

Unfortunately, the panel evidently did not read the report "Grades to Be Tested" or the proposed long range plan for the state assessment program. The latter document clearly discusses the problems associated with such unlimited expansion of the assessment program. The plans include the use of matrix sampling on a statewide basis and the use of every pupil testing for only a small core of objectives as is presently done. It should also be mentioned that the Department's long range plan is being developed with consultation from Dr. Frank Womer, University of Michigan, who is a nationally known expert on testing and who was cited in the panel report.[23]

Domain Limitations of Present Instruments. The panel report accuses the Department of utilizing assessment instruments which are limited in scope.[24] Presumably, the panel objects to the testing of reading and mathematics skill objectives alone and would wish to include psychomotor and affective assessment. The Department staff would agree!

The Department recognizes that the present testing domain is restricted, but it seemed only reasonable to test reading and mathematics first because they are basic learning areas. The Department did not by its actions intend to suggest that schools should only emphasize reading and mathematics; however, the Department feels that student success in these two areas is basic, absolutely necessary, and easily measurable. Local districts have

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[22] Ibid., pp. 14-15. [23] Ibid., p. 7. [24] Ibid., p. 16.

been and should continue to be free to supplement the state assessment tests to cover any other domains of interest. The State Board of Education will continue to encourage local agencies to move in this direction.

Need for Locally Developed Objectives. The panel makes a strong plea for locally developed objectives and the need to preserve local autonomy.[25] The Department agrees that learner performance objectives should be developed in every local school district to supplement the state minimal objectives. However, the Department feels that there is indeed a core set of minimal objectives which transcend local boundaries and that these objectives should be measured through a statewide assessment program.

Clearly, this issue is simply one of different philosophies between the panel and the Department. The Department position is that people today are not place-bound and do not spend their lives in relative isolation. Instead, people are cosmopolitan--they are mobile--they move from city to suburb to city again. These factors plus the use of nationally produced textbooks and teachers educated at relatively similar higher education institutions lead to a common set of outcomes for at least a portion of the country's educational programs. The panel evidently believes this is not the case--that each local district is free to operate completely as it wishes without regard for the fact that nearly one-fifth of all American families move from one location to another annually.

As a last point, there may be cases of principals being pressured to raise scores, or teachers being threatened by low scores, or cheating on the tests. But, the extent to which this is happening is a matter of

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[25] Ibid., p. 17.

conjecture, not fact. If educators are finding that they have not been successfully teaching students the minimal skills they need, the Department hopes that Michigan educators will change their present methodologies. However, this in no way justifies cheating on the tests or otherwise abusing the assessment program's ability to provide usable and helpful information if, indeed, this is happening.

Publication of Test Scores. The panel members quite accurately point to the publication of test results as a sensitive issue and one which has been controversial.[26] Examples of inaccuracies of interpretation are easy to find and are quite often used as justification for not releasing such data.

However, this issue is not simple to dismiss. Pressure from legislators for assessment data, advice of the Attorney General's office, and district assessment rankings required by the original "Section 3" requirements all combined to motivate the State Board to authorize the publication of assessment scores. In addition, not all local districts have had problems with press coverage and have, in fact, been able to work quite closely with the press to accurately report data. Finally, it is hoped school people will not overestimate the influence of mass media in swaying people against the schools with a single article listing low assessment scores. Local educators who are able to identify their critical audiences and provide proper, objective interpretations of the data before any press coverage takes place are usually not affected by inaccurate reporting if it should happen.

The basic issue here is whether or not the educational community is willing to share data with their publics whether or not it makes them "look good."

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[26] Ibid., pp. 17-18.

Teacher Evaluation. The panel members indicate their fear that teachers will be unfairly evaluated by the use of assessment tests--presumably, this possibility is heightened because of the availability of classroom data during the 1973-74 assessment.[27] This fear is well-founded in that it is a possibility. However, the Department knows of no incident in which this has happened in Michigan.

Teacher and administrator effectiveness should be evaluated but such evaluations should not be administered in a threatening manner. Specific evaluation procedures are a local education agency responsibility and are not defined by the Department.

Evidently, the panel believes that achievement test data have no place in teacher evaluations under any circumstances.[28] The Department agrees that such data should not be the sole criterion for releasing a teacher or administrator, but it would be unwise to say that it could not become a component of such a system. Student learning is the primary objective of schools and measures of student growth under the tutelage of a teacher may very well be useful as a part of teacher evaluations. However, it is incumbent upon the Department, the profession, school districts, and colleges to develop in-service programs which will provide assistance to the teacher when evaluations identify ineffectiveness.

Value of the Assessment Program for Various Audiences. The panel report indicates that the educational assessment program is of little value to any major group and that the "posture of nonsupport is widespread throughout the Michigan education community."[29] Unfortunately, the panel presents no data to support such a claim.

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[27] Ibid., pp. 18-19. [28] Ibid., p. 18. [29] Ibid., p. 21.

The Department agrees that there is a lack of enthusiasm within some parts of the education community but the extent of this attitude is not now known. Both the MEA and the Department are conducting surveys of teachers and of citizens to determine support for educational accountability and for the assessment program. These data will be available by mid-May, 1974, and should provide useful information in this regard. *

The feedback received by Department personnel during the current school year is that local educators' have become more positive toward the assessment program because of the objective-referenced tests. Moreover, local administrators and teachers are using the data to improve education in their districts.

The panel failed to mention the Department's increased efforts in the dissemination and utilization area. Department staff have been concerned about a lack of understanding and use of assessment data and have tried some new approaches to dissemination. There are some data to indicate that these efforts have been worthwhile and effective. Additional suggestions by the panel members would have been quite helpful.

Chapter 3 Program

The panel devoted a separate section of their report to an attack on Michigan's compensatory education program. In large part, the panel and the Department simply do not seem to agree on the best way to conduct compensatory education programs. More significantly, the panel report is plagued with inaccuracies in its treatment of the Chapter 3 program.

The panel members compliment the Department for its willingness to devote compensatory funds--in addition to federal funds--to combat

*A Survey of Views Concerning Michigan's 4th Grade Assessment Program, 1973-74. Michigan Education Association - 74-R-26.

educational deficiencies and hope that such funds will be continued.[30] However, the panel finds the evaluation requirements of the Chapter 3 program immensely distasteful.

To clarify the panel's analysis of the Chapter 3 program, it will be useful to cite each of several points made by the panel and to react to each.

Item: "Students are tested to determine whether they have met state standards."[31]

This statement is misleading. Each participating local school district is free to establish its own learner objectives, its own instructional methods, and its own evaluation instruments. The evaluations at the kindergarten and grade one levels are in terms of local objectives which were accomplished. For grades two through six, the evaluations are in terms of the goal of one month gain for every month in the program.

Item: "If students haven't met standards, their district does not receive its allocation of Chapter 3 funds."[32]

This is not true. For grades K-1, full payment is received if the students attain at least 75% of the local objectives. For grades 2-6, full payment is received if the students reach at least 75% of the goal of one month's gain for each month in the program. In cases where there is less than 75% success, the funds are pro-rated.

Districts can recoup all or part of the unearned funds through the provisions of Section 39a of the State Aid Act by providing a new delivery system to correct inadequacies in the programs which were not working well.

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[30] Ibid., pp. 22-23. [31] Ibid., p. 22. [32] Ibid.

In addition, based upon advice from the State Advisory Council for Compensatory Education, additional Chapter 3 changes have been approved by the State Board of Education.

Item: "Money may be awarded not on true gain but on 'test error'."[33]

This is perhaps true to a certain extent but there is no evidence to determine the severity of the problem--if indeed it is a problem. While a single student's score does have a wide error band, there is no district in the Chapter 3 program which has only one student. In fact, a minimum of 30 students is required for participation in the program. Therefore, the issue of individual errors becomes moot, and the issue then becomes, "How much error is there in group scores?" Or, what are the chances that a district would receive funds it did not deserve simply because of test errors?

The Department agrees that this is an issue which would benefit from a controlled, rigorous experiment and would welcome the panel's suggestions for addressing the issue.

Item: "...the alternative delivery systems have consisted of performance contracting..."[34]

This is not true. In fact, few--if any--Chapter 3 districts are using performance contracts.

Even if the panel had not made so many errors in describing the Chapter 3 program, the basic issues would remain:

1) Is it proper to identify districts which have the greatest concentrations of students with basic skill deficiencies?

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[33] Ibid. [34] Ibid., p. 23.

2) Is it proper to allot extra funds to districts which have the greatest concentrations of such students?

3) Should the best known instruments for identifying such academic deficiencies be used?

4) Once funds are allotted, can proper evaluations be conducted by the local districts?

5) If the educational deficiencies are removed, does the justification for the funds disappear?

6) If a district cannot remediate the educational deficiencies with extra funds, should the funds be continued ad infinitum anyway?

These are not simple questions, and the Department does not have all of the answers. However, the panel report is not only negative in tone, but it does not offer any concrete suggestion for improving Michigan's unique performance-based compensatory education program which is specifically designed to demonstrate that Michigan's children--regardless of race, family circumstances, or geographical location--can acquire basic school skills for adult survival.

The Department is willing to listen to any suggestions and hopes they will be forthcoming. However, the State Advisory Council for Compensatory Education is of the opinion the proposed changes in Chapter 3 legislation address most of the concerns which have been expressed.

SUMMARY

As was stated in the opening pages, this document was intended to review the report An Assessment of the Michigan Accountability System

written by Dr. Ernest House, Dr. Wendell Rivers, and Dr. Daniel Stufflebeam. The present document sought to demonstrate that the panel report contained errors of fact, was not totally unbiased, and was not rigorous in its approach. Additional areas of differences in approach to contemporary educational problems between the panel members and the Department have been revealed by this review of the panel report.

In total, Drs. House, Rivers, and Stufflebeam produced a report which had great potential for positive suggestions for improving the educational accountability program but failed to completely live up to its potential.

The panel, in essense, made nine recommendations:

1) that the Department modify the claim that the selected objectives are minimal and represent a statewide consensus,

2) that the Department abandon its plans to publish a book of objectives for parents,

3) that the Department abandon its practice of rewarding school districts for good test performance of their disadvantaged students,

4) that the Department expand its activities in implementing step 5 of the accountability model,

5) that the Department abandon every pupil testing in the assessment program,

6) that the Department validate its assessment tests with minority children,

7) that the Department encourage development of locally developed objectives,

8) that the Department move the assessment program to matrix sampling (related to recommendation 5 above), and

9) that the Department provide assistance and encouragement to local educators in the implementation of the accountability model.

To these recommendations, the Department replies are as follows:

1) the Department disagrees and would suggest the panel members were confused as to the nature of minimal objectives and their derivation, but the Department agrees much clarifying work needs to be done in this area;

2) the Department disagrees and still feels parents have a right to see the performance objectives but agrees that publication of the "handbook" should proceed with caution;

3) the Department agrees the Chapter 3 program design is not perfect and to that extent has recommended changes in the program for 1975-76 based upon the advice of the State Advisory Council for Compensatory Education;

4) the Department agrees that step 5 of the accountability model needs to be developed, but will be quite threatening if steps three and four are not refined first;

5) the Department agrees that testing all pupils in all subject areas would lead to prohibitive costs and has no intention of doing so to the extent that the State Board of Education has adopted a position statement on this issue;

6) the Department disagrees and can document that the present fourth and seventh grade assessment tests were adequately piloted with minority children;

7) the Department agrees that locally developed learner objectives are very important and will continue to assist local school personnel develop objectives;

8) the Department agrees that matrix sampling would be an essential ingredient in future assessment designs, but the Department does not intend to move entirely away from individual tests in certain skill areas at least for the foreseeable future, and

9) the Department agrees with the recommendation to provide assistance to local educators in the implementation of the accountability model and has already taken steps to implement this suggestion.

In summary, the MEA/NEA panel and the Department positions are not far apart. The Department staff agree with six of the recommendations and disagree with three of them. There is every reason to expect that continued involvement of members of the professional education community will be of great assistance to the Department and lead to an improved, workable, reasonable accountability program for Michigan education to the extent that no basic disagreements should exist.

The staff commends the National Education Association for joining with the Michigan Education Association in financing such a study. In effect, the study has done more to focus attention and understanding on what is being attempted to improve the quality of public education than could ever have been accomplished by utilizing only Department staff.

APPENDICES

DEPARTMENT STAFF RESPONSE

TO THE NINE RECOMMENDATIONS OF THE

NEA/MEA ACCOUNTABILITY ASSESSMENT PANEL REPORT

An Assessment of

The Michigan Accountability System

Panel Recommendation No. 1

It is recommended that the Department of Education modify its claim that the performance objectives being published are minimal and represent statewide consensus of public school educators.

Staff Response to Recommendation No. 1

From the beginning of the Michigan Department of Education's program to develop student performance objectives in the various subject areas, the intent has always been to develop these objectives as "minimal student expectancies." When the initial 11 referent groups and the 13 grade level commissions were appointed to develop the first drafts of the objectives, they were consistently instructed to think in terms of minimal student objectives, and each group and every individual who was involved in the development of the objectives was given this same direction. The question always was, in essence, "In your opinion as an expert in the field of mathematics, or science, or communication skills (or in any of the other curriculum areas), what do you think should be minimal expectancies for Michigan students at the end of the third grade, sixth grade, and ninth grade?"

In this sense, a minimal student performance objective is taken to be one that describes an essential skill, knowledge or understanding which is commonly taught at, or below, a specified instructional level and which should be mastered by nearly all regular pupils when taught by means of presently-known techniques. This definition emphasizes that minimal performance objectives deal with essential learnings, with the present state of the teaching art, and with the possibility of near universal mastery. It further attempts to avoid dictating what the total curriculum should be in any given school district.

The question arises, then, "How do we know that what has been defined as minimal in these various area and at these various instructional levels are indeed 'minimal'?" The answer to this question is that although many people who have had extensive experience in these areas have been called upon to provide their opinion as to what constitutes minimal skills, no one at this time can be certain of the minimal nature of these objectives until they have been applied to instruction in actual field situations.

The Department has recently embarked upon a "field-testing" program, whereby teachers who volunteer will use the objectives with their students to validate their appropriateness, utilizing needs assessment and instructional delivery system analysis. In addition, the staff will contract for a survey to be undertaken to verify if, indeed, the various published objectives represent a statewide consensus among the education profession.

Both of these approaches will provide data as to the appropriateness of the objectives and, further, verify whether or not they can be considered "minimal" in nature, and represent a consensus of the teaching profession.

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Panel Recommendation No. 2

It is recommended that the Department of Education abandon its plan to publish a handbook of objectives for parents.

Staff Response to Recommendation No. 2

After the minimal student performance objectives were developed, it was found that they were too voluminous to conveniently pass out to the large numbers of people who were interested in them—particularly parents. The performance objectives are being widely used throughout the country. The Migrant Directors have adopted the math objectives as their model of expectations on a national basis.

Parents have always wanted to know what some reasonable expectations for their children were as they progress through the school system. Realizing that many parents would be interested in reviewing the state's minimal student performance objectives, it was decided that an abbreviated version of the objectives should be developed. This abbreviated version is now in the process of development, and when it is available it will be issued as a handbook for parents. It should be made clear that this handbook is not a "new" set of expectancies, but is simply the student performance objectives that have been developed over the past several years in a form and length appropriate for parents. The State Board of Education has set as one of its 22 goals the involvement of parents in the educational process. Michigan law does not allow the state agency to sell the objectives, and even if it did most parents would feel overwhelmed receiving the unabridged sets.

The staff has, for several years, been testing the handbook concept in 11 pilot elementary schools and will expand that field-testing to 30 school districts in 1974-75, before final publication.

When the handbook is issued, it will include an introduction describing how schools might best put the objectives to use. Parents are also advised as to the nature of the word "minimal" as it is used in the objectives.

This action is consistent with two of the goals of Michigan education, those being the involvement of parents and citizens in the educational process at every step along the way, and not just in voting additional millage, or receiving a report card of student progress.

An Assessment of

The Michigan Accountability System

Panel Recommendation No. 3

It is recommended that the Department abandon its practice of rewarding school districts for good test performance of their disadvantaged students.

Staff Response to Recommendation No. 3

The recommendation represents a blatant disregard for the well-being of the many poor White, Black, Indian and Chicano pupils that are under-achieving in public schools. The record of the public schools lack of success with these children has been well documented by James S. Coleman, Kenneth Clark, Miriam L. Goldberg, and others.

The present State Compensatory Education Program relates funding to program success or student learning, and it is the first and perhaps the only major compensatory education program in the country to document such success. The program's evaluation reports speak for themselves concerning pupil successes in reading and computation. Based upon audited findings of the 99,048 pupils pre- and post-tested in 1972-73, 59.3 percent of the pupils achieved average gains equal to .75 months for each month of the program; and more importantly, 34.5 percent of the pupils achieved gains equal to or greater than one month for each month in the program.

Pupil gains were measured primarily by locally-designated standardized norm-referenced tests in grades 2-6. Criterion-referenced tests were used to measure pupil achievement in grades K-1. This is the record of a performance-based program that has been labeled whimsical by the three "experts." Such success cannot be dismissed on the basis of the comment, ". . . standardized achievement tests are not good measures of what is taught in school." If that is a valid argument, then it's highly questionable any test, particularly teacher-made tests, should be given in any schools.

It should be noted that State Assessment is not used to measure program success. Each local district selects its own test instruments to measure such success. In addition, the State Board has adopted several changes in the Compensatory Education legislation which, according to the State Advisory Council for Compensatory Education, should further strengthen the program.

An Assessment of

The Michigan Accountability System

Panel Recommendation No. 4

It is recommended that the Department expand its activities in implementing Step 5 of the Accountability Model.

Staff Response to Recommendation No. 4

The Department of Education is committed to evaluation development and expansion and, in fact, in the past four years has greatly expanded activities in evaluation. Currently, seven programs of the Department are being evaluated. These evaluation activities cover nearly 1,100 projects in over 500 school districts.

Additionally, technical assistance in evaluation is available to state and local educators in the form of consultation and workshops. Annually 30 or more workshops are conducted throughout the state for local education agency staff. Evaluation of delivery system effectiveness, however, is dependent upon (1) developing expectations, (2) identifying student needs, and (3) analyzing what is being done. As more and more local education agencies develop performance objectives, needs assessment and delivery system analysis, and more and more state and federal programs do the same, evaluation should follow.

The Department of Education concurs with the Panel recommendation to expand its evaluation activities. Indeed, expansion in this area has been rapid (both in terms of quantity and quality) and plans for additional expansion are being developed, but must proceed consistent with the interest, capabilities, and local needs which presently are focused upon spelling out what is expected, what is needed, and how to go about providing the service. Without such careful development, the evaluation component could become extremely threatening as demonstrated in the recent Detroit seven-week teachers' strike.

The staff is currently conducting a survey of local and intermediate school district resources and capabilities in evaluation. Based on the results of this survey, which will be made public later this year, more adequate services will be planned and designed to provide the expansion of activities associated with Step 5 of the Accountability Model.

An Assessment of

The Michigan Accountability System

Panel Recommendation No. 5

It is recommended that the Department abandon every pupil testing in the assessment program.

Staff Response to Recommendation No. 5

This recommendation of the Panel is based on sheer conjecture--no rigorous attempt was made to determine the extent to which decisions are being affected by either the assessment component or the overall accountability program. The Department has not conducted research in this area either, but there is evidence to suggest that the assessment data are being utilized and have affected legislation (e.g., Chapter 3 of the State Aid Bill), judicial decisions (e.g., Milliken and Kelley vs Green, et al), and local school district planning. However since the issue has been raised, definitive data on the extent of local district usage is currently being sought through a survey of school superintendents, and will be reported publicly this summer.

The cost of the program as it is presently structured is almost inconsequential for the results obtained. The tests, on the average, require about five hours of administration time per year for 4th and 7th graders--that's 5 hours for diagnosis out of a minimum of 900 hours of instruction. The financial cost of testing all of the state's 4th and 7th graders is only about 75 cents per pupil--well within the range of commercial test publishers. That's 75 cents out of an average instructional cost of $1000.00 per student. For this investment, the local teacher receives highly specific information on each 4th and 7th grade student's attainment in reading and mathematics; the school and district recieves aggregate summaries; the parent obtains a guide as to his or her child's progress in the basic skills; and the state receives data for statewide decision-making.

The Department is of the firm conviction that in selected subject fields, at selected intervals in the education process, the state should require an assessment of progress on every student. Other state assessment should be by sampling. Beyond that, it should be the responsibility of the local district to determine whether student needs are being made, grade-by-grade and subject-by-subject.

The State Board of Education will be requested to encourage local boards of education to develop compatible and comprehensive local assessment programs.

An Assessment of

The Michigan Accountability System

Panel Recommendation No. 6

It is recommended that the Department validate its assessment tests with minority children.

Staff Response to Recommendation No. 6

The specific charge was levied that "no evidence was available that the items comprising the reading test had been tested or validated" with such children.

This is not an accurate observation. The tests used in the 1973-74 assessment program were developed in five Michigan districts, including Jackson and Pontiac. In addition to pretesting in these original five districts, all eight regions of the Detroit Public Schools voluntarily participated in the pretests of the instruments. Thus, if anything, children from low socioeconomic levels and minority children were over-represented in the field tests.

A more basic issue is whether it would be proper to develop a test specifically designed for minority group children. Such a test could undoubtedly be developed and, in fact, children from majority groups would probably not do well on it.

The staff believes the evidence is overwhelming that the present state assessment is not biased unduly against minority children, and would offer to survey appropriate persons on the issue of test bias.

The Michigan Department of Education takes the position that there is no inherent reason why minority group children cannot learn as well as other children. The purpose of the assessment tests is to distinguish between those children, regardless of color, who have attained certain reading and mathematics skills and those who have not so that appropriate compensating instruction can be provided. If the tests do not discriminate in this manner, no compensating assistance can be provided.

The Department is aware of a recent survey conducted by the Michigan Education Association which will confirm the staff position that the instrument was not viewed as bias by 4th and 7th grade teachers.

Footnote: A Survey of Views Concerning Michigan's 4th Grade Assessment Program, 1973-74. Michigan Education Association - 74-R-26.

An Assessment of

The Michigan Accountability System

Panel Recommendation No. 7

It is recommended that the Department encourage locally developed objectives.

Staff Response to Recommendation No. 7

The charge is made that the state minimal objectives have perverted and threatened local district curricula.

This threat is quite often heard by opponents of the State Accountability Model and its accompanying subsystems. Charges of "state control" are always easy to hurl, difficult to defend against, and impossible to prove.

The Michigan Department of Education has no intention of dictating the curriculum of each local school district, because indeed each district does serve different clienteles. However, there is evidence to believe that all local districts are not now guaranteeing that even minimal reading and mathematics skills will be imparted to nearly all students. The state has the legal responsibility of providing a basic education to all citizens regardless of where they live, go to school, or their family circumstances. To achieve this end, the Department is encouraging the definition of a set of minimal skill objectives which should be attained by children in all schools. The assessment program is constructed around these objectives.

The Department agrees, however, that every local school district should supplement the state minimal objectives and always stands ready to assist local districts in their development. Each local school board should require objectives for each subject taught, and possibly the State Board of Education will be requested to communicate this to local boards of education.

An Assessment of

The Michigan Accountability System

Panel Recommendation No. 8

It is recommended that the Department move the assessment program to matrix sampling (related to recommendation 5).

Staff Response to Recommendation No. 8

The Panel evidently feels that the present assessment program which tests every 4th and 7th grade pupil should be restricted to provide only statewide data. This restriction would not provide individual pupil information usable by classroom teachers for instructional planning purposes. Yet, a recent survey of fourth grade teachers conducted by the MEA indicates a majority of teachers desire pupil level information.

The Department agrees in part with the Panel in that matrix sampling would be a useful technique to provide data on a statewide basis on certain learner objectives. This is reflected in the assessment program (draft) long-range plan currently being developed with the assistance of Dr. Frank Womer, University of Michigan, who is a nationally known expert on achievement testing and one of the "fathers" of the National Assessment of Educational Progress.

It is obvious that the assessment program could not test in the future every pupil on all objectives in each subject area because the tests would be ridiculously long. Instead, the State Board of Education has adopted the policy that each student be tested only on a core of highly important, minimal objectives in reading, mathematics, and selected other areas, and that further data on other objectives be collected by matrix sampling methods. The Department believes that this approach is desirable because it will encourage local educators to focus on each student's attainment of basic reading and mathematics skills, and several other possible areas of universal importance, such as physical fitness or health, while leaving to local initiative the determination of the total curriculum based on local needs.

The Department agrees that it is desirable to assist local educators to develop their own assessment measures and has already undertaken a comprehensive program to carry out this task which will undoubtedly lead to a proposed statewide funding program of inservice training of staff.

An Assessment of

The Michigan Accountability System

Panel Recommendation No. 9

It is recommended that the Department provide assistance and encouragement to local educators in the implementation of the Accountability Model.

Staff Response to Recommendation No. 9

The Department is keenly aware of the need to provide assistance to individual schools and school district staffs who want to implement an accountability approach to improve their services to children. To meet this need several actions have been initiated over the years.

First, the Department sponsored a pilot program with eleven elementary schools, six secondary schools and an intermediate school district to determine the kinds of problems individual schools would have in implementing the six-step Accountability Model. Department staff is working closely with the principals, teachers and central office administrators as they implement each step of the Accountability Model. The schools are in various stages of completion, and when they accomplish all steps of the model they will serve as demonstration sites for others who want to implement a system of program improvement through the six-step model.

Second, for the past four years school districts have been applying for competitive grants under ESEA Title III, and in presenting their proposals they must utilize the six-step Accountability Model. During this time over sixty school districts have been engaged in the six-step accountability procedures through ESEA Title III grants. Department staff provided the necessary technical assistance to each of the participants in an effort to help them use the model effectively.

The Department staff has provided numerous workshops in local and intermediate school districts in an effort to provide technical assistance to those school districts who want and need such help. It should be noted, however, that this effort is impeded because of the magnitude of the demand, and the limitation of the number of Department staff. Hopefully, as more superintendents, principals and teachers learn to implement the model effectively, they will be able to serve others in acquiring this skill. Just as important is the need to tap the college staffs to assist in this endeavor.

Finally, the Michigan Association of Elementary School Principals and the Michigan Association of Secondary School Principals have requested assistance for their memberships in utilizing the Model, and such training sessions are being jointly planned.

The Department of Education stands ready to be of greater assistance in expanding, on a voluntary basis, the unique training components of the Accountability Model, which have been underway for four years, and welcomes suggestions on how this can best be accomplished.